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KEY DATES

Monthly Reports

Self-Monitoring Reports Due by the **15th**
(Ex. September SMR due October 15th)

Semi-Annual Reports

June 1st – Period 1 Semi-Annual Report Due.

- Sampling Window is from November 1st – April 30th

December 1st – Period 2 Semi-Annual Report Due

- Sampling Window is from May 1st – November 30th.

Annual Reports

June 30th- Flowmeter Calibration Reports due

CITY OF MEMPHIS IMPP INFORMATION

Largest Pretreatment Program in TN (based on number of Industries)

Largest Pretreatment Program in EPA Region 4 (AL, FL, GA, KY, MS, NC, SC, TN)

18th Largest Pretreatment Program in the Nation (out of ~1,500)

2020- IMPP collected and analyzed ~7,000 samples

- Industries collected and analyzed ~97,000 samples

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SPOTLIGHT

New Employees

Rafael Pham joined our Team in January 2022 as an Environmental Engineer. Rafael attended the University of Memphis and earned a B.S degree. in Engineering. Rafael currently oversees fifteen industries is an extremely hard worker and is very detail oriented. He was awarded the Shining Start Award for the Division of Public Works. Congratulations Rafael, thank you for all your hard work!

Although new to our team, Lahsonda Berry has over 15 years' experience with the city's Environmental departments. She is an UT certified Administrative Professional and manages the Program's contracts, accounts payable, and waste hauler billing. Lashonda goes above and beyond in everything she does and has proven to be a major asset to the Program.

Our Team is excited to have Lashonda and Rafael and we anticipate even more great things from our newest members. WELCOME ABOARD!!!!

Program Projects

Effective November 17, 2022, the City of Memphis implemented the attached pH Excursion Policy ("Policy"). While the City's Sewer Use Ordinance provides that a pH greater than 10 is a violation, the City has authority to exercise enforcement discretion for infrequent pH excursions of the upper pH limit that do not exceed 11.5 s.u. The Policy is set forth to aid in evaluating compliance of such pH excursions with the restrictions described below:

- Excursions are not allowed for batch dischargers.
- No excursion below 5.5 s.u. are allowed.
- No excursions greater than or equal to 11.5 s.u. are allowed.
- The policy applies only if minute by minute flow and pH is provided.
- pH calibration logs must also be provided with each monthly report.
- Excursions > pH 10 s.u. should not exceed 30 minutes during a compliance period, with a maximum of 10 minutes 10.5 s.u. > pH < 11.5 s.u.; excursions are the exception and should only be considered on a periodic or infrequent basis.
- If WWTP effluent is > 9 s.u., and IU discharge pH > 10 s.u., the policy may not be applied.
- Excursions are not subject to this policy when the IU discharge is in noncompliance with an applicable pH limit in a categorical guideline or is deemed problematic.

There is no application process for discretion under the Policy; however, to be considered, an Industrial User must provide the following:

- IUs must report pH excursions in accordance with their IWDP, including an explanation of why the excursion occurred and remedial actions.
- IUs must operate and maintain continuous flow and pH monitoring.
- SMRs must include minute-by-minute reporting for flow and pH.
- Calibration of pH monitoring equipment must be conducted, and calibration logs must be submitted with flow and pH data.
- Data must be submitted electronically.

A copy of the pH Excursion Policy can be found on the City of Memphis IMPP website at <https://www.memphistn.gov/government/public-works/environmental-engineering/industrial-monitoring/>

Waste Haulers

Attention Permitted Waste Haulers:

The City has put forth a concerted effort to repair and clean the collection system and, in an effort, to increase longevity, efficiency and effectiveness of the collection system and wastewater treatment facilities, it is in the City's best interest to minimize pollutants that interfere with the collection system and wastewater treatment plants processes. Therefore, effective immediately, the City of Memphis will **only** accept septage wastewater generated within Shelby County, TN limits. Septage waste includes portable toilet waste and septic tank.

Prohibited waste includes, but is not limited to:

- grease trap waste;
- carwash sump water;
- unpermitted and industrial wastewater;
- industrial wastewater that has *not* been pre-approved;
- any wastewater generated outside of Shelby County, TN limits; and
- any wastewater that comprises of anything other than septage waste.

Please seek appropriate alternative disposal means for the above listed prohibited wastewater.

This prohibition is applicable at both M.C. Stiles WWTP and T.E. Mason WWTP.

Failure to comply with this prohibition may result in civil penalties up to \$10,000 per day per violation and suspension up to termination of dumping privileges.

Thank you for your cooperation and please call 901-636-4336 if you have any questions.

COMPLIANCE TIPS

- Ensure all reports are complete and submitted by due dates.
- Ensure all reports are signed by an Authorized Representative.
- Include the proper certification statement (i.e., "I certify under penalty of law...") with all submittals.
- Submit wet ink original reports in addition to any electronic submittals.
- Conduct sampling events at the beginning of each month if your IWDP includes monthly average limits.
- Calibrate pH meter(s) frequently.
- Ensure pH buffer solutions are not expired.
- Calibrate flow meter(s) frequently (at least annually)
- Ensure all detection limits for parameter compliance are \leq the permit limits.
- Conduct multiple semi-annual sampling events within each window to avoid status of Significant Noncompliance (SNC).

Q & A



1. Where should the composite sampler tubing be placed when sampling from flumes, spillway boxes, or pits?

Ans: Tubing should be placed in the middle of the stream flow if possible, since it's common for debris to build up on the bottom of these sampling locations.

2. What volume for each sample aliquot must be collected when using automatic samplers?

Ans: Automatic samplers must be set to collect at least 100 ml for individual sample aliquot.

3. What is the notification requirement for Industrial Users that become aware of discharge violations?

Ans: Industrial Users are required to report discharge violations to IMPP within 24-hours of becoming aware of such violations.

4. What is the sampling requirement for Industrial Users that become aware of discharge violations?

Ans: The Industrial User shall repeat the sampling and analysis and submit the results of the repeat Analysis into our office within 30 days of becoming aware of the violation. [40 CFR 403.12(g)(2)]

5. What is the minimum pH limit for Industrial Users that discharge into the City of Memphis POTW?

Ans: 5.5 S.U. is the minimum pH limit for Industrial Users discharges to the POTW.

Please send any questions that you may have to Derrick Porter; derrick.porter@memphistn.gov.